USATA
United States Air Tour Association
Commercial Air Sightseeing & Transportation

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These comments are offered on behalf of the members of the United States Air Tour Association (USATA) and, in particular, its members who provide air tour services at the Grand Canyon.

Every day that goes by, the failure of the Federal Aviation Administration (FAA) to implement "reasonably achievable" quiet technology standards and incentives for Grand Canyon air tour operators is having a significant impact on their businesses, the industry as a whole, and on visitors' opportunity to see the spectacular Grand Canyon by air.

Overview

As background, during a "normal" year of activity, more than 800,000 tourists take air tours of the Grand Canyon. More then 500,000 of them fly to the Grand Canyon from Las Vegas. A study by the economics department of the University of Nevada at Las Vegas showed the economic impact of air touring on the Southern Nevada economy to be in excess of $350 million. That's in a good year. But, the past couple of years have not been "good" or "normal" years for air touring anywhere.

Air touring in all locations was severely impacted by the tragic events of September 11th and are continuing to be impacted by affects of the war in Iraq.

Following September 11th, commercial air sightseeing companies serving the Grand Canyon experienced anywhere from a 50 percent to 70 percent decline in passengers. They are still down as much as 30 percent. The unavoidable groundstop alone cost these companies upwards of $1.4 million in lost revenue. Most of these companies reduced their staffs by between 30 percent and 45 percent, grounded many aircraft in their fleets in order to get them off of insurance rolls, postponed planned capital expenditures, slashed executive sala-

ries and did whatever else they could possibly do to reduce costs during that extraordinarily difficult time.

The war in Iraq had a similar impact on business. Indeed, we saw business decline significantly in the weeks and months leading up to the war. Bookings were and still are being cancelled as many international travelers particularly those from Asian countries choose to vacation elsewhere.

The impact from world crisis is difficult enough for these companies to withstand. But, when combined with oppressive government regulations, it is difficult for anyone to understand how these companies stay in business at all.

1.7 million. That's how many visitors will be denied recreational access to the Grand Canyon during the next decade based on government restrictions -- caps/flight limitations -- on air tours. 1.7 million. And, that's just at the Grand Canyon.

Who are these people who take air tours and why do they do it? Grand Canyon air tour visitors take air tours for many reasons.

- Many are elderly or disabled and for them air touring is the only way for them to see our national parks.

- Some are in poor health and unable to hike the trails, backpack in the wilderness, or even get out of a bus and walk to a scenic overlook. Air touring is the only alternative they have.

- Some are on family vacations and have only limited time. Without the opportunity of taking an air tour, they would be unable to enjoy the breathtaking scenery our national parks offer.

- And some find seeing a national park from the air better and more enjoyable than seeing it any other way.

Each and every one of these segments of society is impacted when the federal government creates a regulatory environment limiting recreational access to our national parks.

- Nearly all of our members' customers are time-constrained to one degree or another. Of those flying to the Grand Canyon from Las Vegas, 100 percent of them are time-constrained. The only way for them to see the Grand Canyon is by air. They will not see the Grand Canyon except by air tour because their travel plans do not include a trip to Arizona.

- 60 percent of the Grand Canyon customers are retirement ago or older, disabled, have health problems or are too young to see the Grand Canyon any way other than air tour.

- 95 percent of the Grand Canyon customers are from international destinations. Most of those are from Japan, Korea and China with the UK,

- Germany and France representing the next largest group.

In addressing the issue of the disabled, the NPS 2001 Management Policies Guide says specifically "All reasonable efforts will be made to make NPS facilities, programs, and services accessible to and usable by all people, including those with disabilities . . . One primary tenet of disability rights requirements is that, to the highest degree reasonable, people with disabilities should be able to participate in the same programs and activities available to everyone else."

When more than 40 percent of air tour passengers are either disabled or have health related problems which preclude them from visiting the Grand Canyon any other way, NPS/FAA regulations are clearly inconsistent with the Park Services stated policy on this issue.

Contrary to proclamations by the federal agencies of jurisdiction, denying air access to our national parks does have a significant impact on foreign trade and is contrary to the provisions of the Trade Agreement Act (TAA) of 1979 which specifically prohibits Federal agencies from engaging in any standards or related activities that create unnecessary obstacles to the foreign commerce of the United States.

At the Grand Canyon alone, more than 60 percent of air tour park visitors flying either from Las Vegas or from the Grand Canyon National Park Airport are from foreign countries. To say, as the Federal Aviation Administration does, that flight caps, curfews and other access-limiting regulations do not impact foreign trade is simply incorrect.

Specifically, the fact is that the overall demand for air tour flights at the Grand Canyon has not significantly increased over the last half dozen years. Rather the number of companies providing air tour services out of Las Vegas has decreased some 60% since 1995. Problem is that limiting or capping flights based on the baseline of 1997-1998, due to worldwide economics, is not reflective of numbers of fights needed to accommodate the 1995-1996 time frame, let alone allow for any moderate growth. Additionally, with the economic demise of so many operators since 1995, there has not been an accurate redistribution of flight allotments to the remaining operators. Competitively speaking, an unfair advantage or disadvantage exists between current operators concerning their growth capabilities. As stated previously, overall industry growth is relatively

small year to year, if at all. But expansion and contraction between competitors for market share is at issue each season.

The 2001 NPS Management Policies Guide further states:

"National parks belong to all Americans, and all Americans should feel welcome to experience the parks . . . Providing opportunities for appropriate public enjoyment is an important part of the Service's mission . . . Enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks . . . The Service is committed to providing appropriate, high quality opportunities for visitors to enjoy the parks, and will maintain within the parks an atmosphere that is open, inviting, and accessible to every segment of American society . . . The fact that a park use may have an impact does not necessarily mean it will impair park resources or values for the enjoyment of future generations."

In a not-so-veiled attempt to try and justify its actions and the actions of the FAA with bogus sound data, the Park Service implemented new draconian rules in Director's Order #47 which guarantee the eventual elimination of all air tours at the Grand Canyon.

In testimony before the National Parks and Public Lands subcommittee, it was previously learned through expert testimony and admissions from NPS officials that noise monitoring computer modeling in the Grand Canyon both had been manipulated and had not undergone scientific validation or peer review. In a subsequent hearing, it was learned that the Park Service was making a significant policy shift proposing in Director's Order #47 to set the acceptable noise level in one backcountry zone of the Grand Canyon at 8 decibels below natural ambient sound.

Then perhaps even more onerous and more a frightening for air touring and all other forms of mechanized recreational park users, the new Park Service policy arbitrarily abandons the longstanding "noticeability" standard in favor of a "detectability" standard as the criteria for determining acceptable levels of sound.

Originally the Park Service had a sound threshold for achieving substantial restoration of natural quiet in the Grand Canyon of 3dB(A) above ambient sound using the threshold of "noticeability" – the level at which a person thinking about something other that aircraft would first notice aircraft sound.

The Park Service then changed that policy to better suit its purposes and proposed a new methodology for determining sound based on a standard of audibility or "detectability" – the threshold at which a person intently listening for a sound of known character such as an aircraft would first detect it.

In Director's Order # 47, the Park Service claimed to have stationed human "listeners" at various locations around the Grand Canyon and asked them to take note of when they heard an aircraft. The Park Service claimed that those trained "listeners" heard or "detected" aircraft noise at between 8 and 12 decibels below the average ambient sound levels thus justifying their proposal to set minimum acceptable sound levels at 8dB below natural ambient sound – based on the new "detectability" standard.

According to acoustical experts familiar with this issue – J.R. Engineering of Seattle, Washington -- abandoning the noticeability standard in favor of a detectability standard is neither appropriate nor in conformance with accepted industry standards. Ground visitors don't just stand out in the wilderness trying to hear aircraft. If they are doing what we are led to believe the Park Service is trying to protect, they're listening to the birds, smelling the flowers, and watching the little squirrels scurry along the trails.

Based on J.R.'s review of engineering reports of Harris, Miller, Miller and Hanson – the Park Services noise consultant – there were no new noise studies conducted for the NPS prior to this action. There were no measurements or human observations, only some new arithmetic performed on two year old measurements and studies. In fact, at no time did any observer actually detect any aircraft sounds at anything close to the levels indicated in the NPS Public Notice either in the Grand Canyon or anywhere else.

Flight Caps

If not an outright ban, one of the easiest ways to deny access to air tours or other forms of recreational activity is to establish activity limits. In the case of air tours it takes the form of caps on the number of flights which can be conducted over a national park. Using voodoo scientific methodology and partial flight data, the Park Service and FAA did just that with its cap rule in the Grand Canyon. The results are devastating.

Flight caps have imposed massive, unrecoverable economic losses on a number of air tour providers which, by this fall, will force some operators out of business.

Here's is a sampling assuming a "normal" year of customer traffic:

In 1999, Grand Canyon Airlines flew 3,085 flights at the Grand Canyon. Keep in mind, that number is already 70 percent fewer flights than the company flew before because it voluntarily spent millions of dollars converting it's fleet to larger quieter aircraft. If this were a normal year, flight cap restrictions could cost GCA more than $650,000.

In a normal year, Air Vegas Airlines would exhaust it's flight allotments by October. This would result in a revenue loss of $1.3 million.

Other operators are reporting similar economic losses as a result of the flight cap rule, are bleeding to death, and closure is only a matter of time.

This background is intended to frame the quiet technology issue and the importance of developing reasonably achievable quiet technology standards in the real-world crisis Grand Canyon air tour companies face because of global events and unprecedented government regulatory tampering with the viability of the industry.

To the issue at hand.

Quiet Technology

Whether its modifying engines, reconfiguring propellers or rotor blades, transitioning to larger aircraft, or finding ways to fly more quietly, air tour operators have, for years, been working to be better neighbors. Certainly in aviation, the results of many hours of work and many millions of dollars of investment have paid off. This was all done in good faith as the FAA consistently led the air tour industry to believe that quieter aircraft and Park access were synonymous.

Title VIII of the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (Public Law 106-181) known as the National Parks Air Tour Management Act of 2000 stated that within 12 months after the date of the enactment of this Act (by April 5, 2001), the [FAA] Administrator (1) shall designate reasonably achievable requirements for fixed-wing and helicopter aircraft necessary for such aircraft to be considered as employing quiet aircraft technology and (2) shall establish a quiet technology advisory group.

The Act further states that, in consultation with the [NPS] Director and the advisory group, the Administrator shall establish, by rule, routes or corridors for commercial air tour operations by fixed-wing and helicopter aircraft that employ quiet aircraft technology for (1) tours of the Grand Canyon originating in Clark County, Nevada; and (2) ``local loop'' tours originating at the Grand Canyon National Park Airport, in Tusayan, Arizona.

The Act goes on to provide that for commercial air tour operations by any fixed-wing or helicopter aircraft that employs quiet aircraft technology and that replaces an existing aircraft shall not be subject to the operational flight allocations that apply to other commercial air tour operations of the Grand Canyon, provided that the cumulative impact of such operations does not increase noise at the Grand Canyon.

The April 5, 2001 deadline came and went now more than two years ago and the FAA still has not designated “reasonably achievable requirements” for quiet technology in the Grand Canyon.

Since passage of the Overflights Act of 1987, quiet technology has been recognized as a key to achieving the substantial restoration of natural quiet in the Grand Canyon. The Act itself spoke directly to the issue. The 1994 NPS Report to Congress spoke to the issue. The FAA clearly envisioned in a 1996 Advanced Notice of Proposed Rulemaking (ANPRM) which accompanied the imposition of caps, curfews and other onerous restrictions on Grand Canyon air tour operators the need for incentives for operators transitioning to quieter aircraft which included preferential routes and relief from flight caps.

The FAA was very specific in the ANPRM when it said, “ . . . the FAA agrees that the use of quieter aircraft will, in the long run, provide the most benefit toward restoring natural quiet [to the Grand Canyon] . . . the FAA and NPS are working together to develop a long-term comprehensive noise management plan that will address . . . provision of appropriate incentives for [operators] investing in quieter aircraft, and appropriate treatment for operators that have already made such investments.” The message contained in the ANPRM was clear -- Grand Canyon air tour operators utilizing quieter aircraft would not be subject to caps on flights and would be provided incentive routing. That has not occurred.

Previously, the FAA, in withdrawing the ANPRM, commented to operators that it could not move forward on quiet technology because it could not define what a quiet aircraft is. Then in a FAA response letter to Senators Reid and Ensign, the agency commented that this is the most expensive piece of the three-legged stool and should be delayed until the results of the other two steps in the process are in. That, of course, would be a self-fulfilling prophecy. Caps and unscenic routing have wreaked such havoc in the industry that it may be far too late for some operators for any quiet technology incentives to provide the relief needed for operators to maintain viability.

Already, Grand Canyon air tour operators have invested millions of dollars and years of effort designing or obtaining “quieter” aircraft. Here are some examples:

Papillon Grand Canyon Helicopters – one of the oldest and most successful air tour operators serving the Grand Canyon -- spent eight years and $14 million modifying a Sikorsky S-55 into a quieter air tour platform. That included redesigning the main rotor, replacing the three-bladed rotor with five blades, reducing the RPMs and adding a new exhaust system to the machine. They did this (1) because it is the right thing to do and (2) in anticipation that the FAA would keep its word and move on the development of quiet technology incentives. The new S-55 WhisperJet produces less than one half of the sound generated by many other rotorcraft.

In 1984, Grand Canyon Airlines (GCA) began its conversion to larger aircraft, reducing its fleet from six (6) Cessna 207s to only two (2) Dehavilland Twin Otters, each of which has seating capacity for 19 individuals. This voluntary aircraft upgrade cost GCA $1,550,000 (1981 dollars), but allowed GCA to reduce the number of flights it flew by two thirds, with a corresponding reduction in aircraft sound generated by GCA operations in the Grand Canyon.

In 1986 GCA again established itself as the leader of the "quiet technology" revolution when it developed quiet aircraft technology that could be applied to the Twin Otter. The result is the "VistaLiner," which remains the industry standard for "quiet aircraft technology." Scientific testing conducted by the FAA proves that the VistaLiner is an incredible 66 percent quieter than the Twin Otter. Additionally, only one other air tour aircraft is quieter than the VistaLiner in absolute terms and that aircraft, the Cessna Caravan, requires twice as many flights to carry the same number of passengers as the VistaLiner. Thus, no aircraft can carry as many passengers as quietly as the VistaLiner. Inexplicably, the FAA has refused to give GCA any credit whatsoever for voluntarily switching from small conventional aircraft to the larger and quieter VistaLiner, or for reducing, from over 10,000 to less than 3,200, the number of flights GCA flies around the Grand Canyon each year.

Other air tour operators also are voluntarily working toward quieter machines yet they receive no credit for their efforts and have no incentives to continue those efforts. Scenic Airlines spent more than $25 million in 1996 converting its fleet to the quieter Twin Otter Vistaliner. Air Vegas Airlines spent millions of dollars transitioning to the larger and quieter Beechcraft C-99. Helicopter operators have transitioned their fleets to quieter machines. Yet none of these companies has received any acknowledgment from the federal government in terms of relief from caps, curfews, better routing, etc.

Because of the significant drop in commercial air sightseeing flights since September 11 and now again in the face of the war in Iraq and the SARS epidemic, Grand Canyon operators naturally did not reach their cap limits last year and likely will not again this season. But, as the market slowly recovers and tourists slowly begin returning to Southern Nevada and Northern Arizona, it will be critical to their recovery that there be no limitations on the amount of passengers these small businesses can serve. The last thing the commercial air sightseeing industry needs during the recovery period are barriers to business and the operational caps and unrealistic curfews currently in place burden these air tour operators with obstacles which can only exacerbate the economic devastation they face now and in the foreseeable future. The major airlines face no such obstacles. Regional airlines face no such obstacles. Other segments of the commercial aviation industry face no such obstacles. But, commercial air sightseeing companies flying only at the Grand Canyon do.

USATA position on quiet technology:

♦ As mandated by Congress, any quiet technology standard must be "reasonably achievable."

♦ Larger aircraft with more passenger seats should be allowed to generate proportionately more noise to define quiet technology as a part of an overall approach to quiet technology regulations.

♦ A methodology to define quiet technology must be implemented which permits any operator utilizing any aircraft to demonstrate its ability to fly to a reasonably achievable quiet technology standard. No operator should be disqualified from flying its aircraft on air tours of the Grand Canyon or should not be eligible for incentives based solely on their aircraft it utilizes, its certification noise profile or any other artificial baseline. Aircraft can be flown different ways using different configurations which safely and effectively reduces its sound impact. For example, Air Vegas Airlines flies a fleet of Beechcraft C-99 aircraft. It utilizes the same basic powerplant – the PT6 – as the Cessna Caravan and Twin Otter Vistaliner and has been modified for sightseeing operations to include extra windows. The average price for these aircraft is $1.3 million per aircraft. The FAA studies which placed these aircraft into category "B" were based on max RPM level 2200 RPM. However, when the RPM is safely reduced to 1800 (a reduction of 14 percent), there is an equal reduction of 14 percent or more in the dB level produced by the propellers, thus a 68.2 dB. Air Vegas operations specifications require pilots to maintain propeller RPM at 1800 and with this power setting a Beechcraft C-99 is well below the Category "C" cutoff of 78 dB for a 15-passenger aircraft. USATA believes there also should be an incentive for decreasing the percent of time audible for this or any like aircraft based on the speed of the aircraft.

Operators conforming to the definition of quiet technology should be provided a variety of incentives such as relief from all caps and curfews, incentive routes from Las Vegas to the Grand Canyon National Park Airport and loop routes for operators based at the GCNP Airport. Other incentives to be considered should include low-cost federal loans, over fee rebates or investment tax credits or elimination of overflight fees altogether.

Responses to Questions

1. How reasonable is the noise efficiency approach (larger aircraft with more passenger seats are allowed to generate proportionally more noise) to define quiet technology and how appropriate is the use of certificated noise level as the basis?

- USATA supports the position of the Helicopter Association International (HAI) and does not agree with the proposed terminology, “Quiet Technology Designation”, as it is too general a term and potentially misleading when utilized in the narrow scope of air tours in the GCNP or other national parks where air tours are conducted. The thrust of the SNPRM is to create a designation for quieter aircraft that will be used in the Grand Canyon National Park (GCNP), and create potential incentives for operating quieter aircraft with a relative increase in seat loading. There is the political reality that the term QTD could migrate to other areas of the country that are not necessarily national parks or the GCNP (such as those regulations being established by local zoning planners) and be used as justification for prohibiting heliports or helicopter operations in various municipalities. It is therefore recommended that the QTD designation be redefined as a “Quiet Air Tour Designation” (QATD) to be applied for the GCNP and any future migration of the standard to other national parks. The term “QTD” may have innumerable future political consequences that were not part of the mandate to determine what quiet technology should be used in GCNP.

- As stated earlier, the noise efficiency approach to define quiet technology is sound and allows for larger aircraft (and resultant increase in seats) to generate proportionally more noise. The proposed QTD is defined in terms of *the number of seats*; however, there is not a clear definition of what is meant by *the number of seats.* It is assumed from the discussion in the SNPRM that this refers to the *number of passenger seats.* Even so, this still requires further clarification.

♦ It is felt that the use of certificated noise level as the basis for establishing noise efficiency is not the best approach for determining an aircraft's ’actual" noise profile in flight. However, it could be acceptable if combined with an operator’s ability to demonstrate an ability to fly to a standard as discussed earlier. However, USATA supports the HAI position that *disagrees* with the “10log” slope of the curve used to delineate those aircraft above two seats that meet the QTD limitation. The slope of the curves, “10log,” should be increased to “12log,” which would allow some of the new technology aircraft that have been developed in recent years to fall under the proposed QTD. In effect, the proposed QTD 10log slope actually eliminates more modern and technologically advanced derivative aircraft. Aircraft that have better operating performance and lower direct operating costs as well as those aircraft that have been developed and derived from other models for those purposes, should not be arbitrarily eliminated.

2. What provisions should be made for changes in technology that result in source noise reduction and/or increased noise efficient aircraft designs?

♦ Again, USATA supports the HAI position and joins them in recommending that incentives for research and development for source noise reduction technologies should be made available to both manufacturers and others for developing Supplemental Type Certificates (STC). These incentives could be in terms of research grants or directed appropriations in the NASA budget. As modifications and STCs are developed that do in fact reduce source noise and/or increase noise efficient aircraft designs, operators of these modified aircraft should be allowed increased operations within GCNP either through numbers of operations, additional eligible daytime hours to be flown, or additional routes that may not be available to other aircraft.

3. What operational and economic incentives should be considered in order to achieve the transition to quieter aircraft and how should the quiet technology designation be used in the establishment of the incentives?

♦ As stated earlier, there are a number of incentives that USATA recommends applying to those operators who purchase, upgrade, or modify their tour fleets to achieve noise efficiency in consonance with the quiet technology mandate. They include relief from all caps and curfews, incentive routes from Las Vegas to the Grand Canyon National Park Airport and loop routes for operators based at the GCNP Airport. Other incentives to be considered should include low-cost federal loans, over fee rebates or investment tax credits or elimination of overflight fees altogether.

4. Should incentives include a “flexible” cap that would permit increasing operations of aircraft based upon the acquisition of leading edge noise efficient technology by operators?

♦ Absolutely. A flexible cap, which would include no cap for QTD aircraft, would provide an incentive to operators. Additionally, the cap on operations should be raised when operators fly in a way that does not increase the overall noise limits. In other words, flying at reduced gross weight, reduced RPM, and reduced airspeed, or varying altitudes can all reduce noise by not employing the acquisition of new technologies. Credit should be provided to those operators who fly in an approved “noise abatement” flight regime. It can be assumed that application of these noise abatement procedures will yield noise levels less than that of the noise certification levels, and that these could be developed and submitted as a flight manual supplement for flight within GCNP.

5. Should growth be tied to an incentive system for existing operators to convert their fleet to quiet technology?

♦ The degree of growth is immaterial, as long as the established noise mandate is maintained. Incentives for purchasing quieter technology

aircraft are all contained in the answer to question 4 above. However, incentives should be encouraged, even for operational changes that reduce noise levels. These operational changes include reduction in airspeed, RPM, gross weight, and altitude. As discussed earlier, all operators, no matter the equipment they utilize, should be permitted to demonstrate the ability to fly to a reasonably achievable quiet technology standard.

6. What operational limitations (phase-out, expanded curfews, noise budgets, quota system, etc.) should be considered and how should the quiet technology designation be used in the setting of the limitations?

The following apply:

♦ The key operational limitation that should be adjusted when operators employ quiet technology either by fleet transition or the demonstrated ability to fly to a QT standard should be the elimination of all caps and curfews. The established curfews are key periods for tour operators, and their implementation have caused significant loss of revenue.

♦ A phase out of aircraft should not be necessary, as other operational incentives will cause an increase in quiet technology aircraft.

♦ Manufacturers should be provided tax relief for the development of noise abatement techniques. Operators flying in the GCNP can incorporate these operational flying techniques into the flight manual for use.

The sadness is why we continue to debate these issues in the first place. In 1988 Special Federal Air Regulation 50-2 was implemented in the Grand Canyon. The purpose of this regulation – a regulation mandated by the United States Congress under Public Law 100-91 – was to put in place a procedure that would improve safety and reduce the noise impact from air touring aircraft on park visitors. The rule implemented a new route structure ensuring that aircraft avoided areas of large concentrations of ground visitors and set standard altitudes and routes for fixed- and rotor-wing aircraft.

The results of SFAR 50-2 were and are significant and clearly restored natural quiet to the Grand Canyon as the Overflights Act mandated:

- Safety improved dramatically. There has not been one accident involving an air tour aircraft in SFAR airspace since the rule went into effect;

- NPS' own studies have shown that 92 percent of Park visitors report that they are not adversely affected by aircraft sound;

- Back country Park visitors representing approximately 18,000 visitors a year (out of 5 million) – *one half of one percent of all visitors to the Grand Canyon* -- reported either seeing or hearing only one or two aircraft per day;

- Park Service studies also showed that visitor complaints about aircraft noise dropped significantly. 26 complaints from more than five million visitors is a remarkable achievement by air tour operators;

- A 1992 follow up study by the U.S. Forest Service concluded that:

> *"Few adverse impacts to wilderness users were found resulting from aircraft overflights . . . it appears that many visitors do not notice aircraft even when they are present . . . aircraft noise intrusions did not appreciably impair surveyed wilderness users overall enjoyment of their visits to wilderness nor reduce their reported likelihood of repeat visits."*

So, by all standards and measurements, natural quiet as per the Congressional mandates established in the 1987 Overflights Act, has been achieved in the Grand Canyon as a result of SFAR 50-2. Yet, the air tour industry has continued to suffer under more and more onerous regulatory actions driven by environmental extremists and the National Park Service yet imposed by the Federal Aviation Administration.

Grand Canyon air tour operators lost upwards of $20.5 million as a result of the impact following September 11th. Their businesses continue to suffer today. The key to their futures is the ability to recover economically. As we have demonstrated, many operators have invested millions of dollars transitioning to larger and quieter aircraft based on the FAA-promoted belief such investment would buy them something tangible. Thus far it hasn't. The combination of large capital investments in quiet technology and enormous economic losses resulting from September 11th and other world events have left all Grand Canyon air tour companies in very tenuous positions. Quiet technology incentives as discussed earlier represent key components to their ability to continue in business and be competitive in the marketplace. We hope that the FAA is finally serious about developing reasonably achievable quiet technology standards.

Thank you for the opportunity for the United States Air Tour Association (USATA) to comment.

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